

Michael Faillace & Associates, P.C.

Employment and Litigation Attorneys

60 East 42nd Street, Suite 4510
New York, New York 10165

Telephone: (212) 317-1200
Facsimile: (212) 317-1620

gnaydenskiy@faillacelaw.com

August 24, 2021

Via ECF

Honorable Judge Jesse M. Furman
United States District Court
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: Espinoza et al v. Euro Design and Stone LLC et al
20-cv-04381-JMF

Your Honor:

We represent the Plaintiffs in the above titled matter. We write to respectfully request an extension of thirty (30) days for the Plaintiffs to file its Default Motion. There are 19 plaintiffs in this case and will require more time to properly acquire declarations for all of them. At present, Plaintiffs' attorneys have begun compiling declarations from each plaintiff but will need more time in order to acquire all of them from each Plaintiff. It is my intention to resolve and file the Default Motion as soon as possible.

We thank the Court for its time and attention to this matter.

Application GRANTED *nunc pro tunc*. Further extensions are very unlikely to be granted. Additionally, counsel is reminded that, per the Court's Individual Practices, extension requests must be made least 48 hours in advance of the relevant deadline, absent an emergency. For avoidance of doubt, Plaintiffs shall file any motion for default judgment no later than **September 23, 2021**. Defendants shall file any opposition no later than **September 30, 2021**. The default judgment hearing currently scheduled for September 10, 2021, is ADJOURNED to **October 7, 2021, at 4:45 p.m. in Courtroom 1105 of the Thurgood Marshall Courthouse, 40 Centre Street, New York, New York**. The Clerk of Court is directed to mail a copy of this Order to Defendants and to terminate ECF No. 92.

Respectfully Submitted,

/s/ Khalil Huey
Khalil Huey Esq.

SO ORDERED.



August 25, 2021